

UNITED STATES DISTRICT COURT

for the
Eastern District of Tennessee

FILED

APR 15 2019

United States of America)

v.)

Case No. 1:19-mj-8

Clerk, U. S. District Court
Eastern District of Tennessee
At Chattanooga

DANIEL CLAYTON BRYANT)

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 1, 2019 - April 3, 2019 in the county of Hamilton in the
Eastern District of Tennessee, the defendant(s) violated:

Code Section

Offense Description

18 USC § 1201

Kidnapping

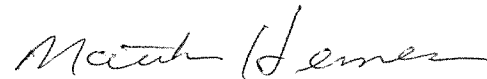
18 USC § 2113(a) and (e)

Bank Robbery and Extortion

This criminal complaint is based on these facts:

See attached affidavit

☒ Continued on the attached sheet.



Complainant's signature

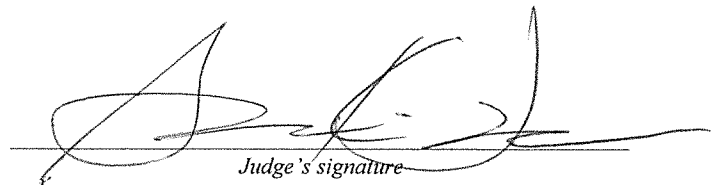
Matthew Hennessee, Task Force Officer, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date:

April 15, 2019 @ 11:42 AM



Judge's signature

City and state:

Chattanooga, Tennessee

Susan K. Lee, U.S. Magistrate Judge

Printed name and title

**AFFIDAVIT IN SUPPORT OF
CRIMINAL COMPLAINT**

I, Matthew Hennessee, being first duly sworn, hereby depose and state as follows:

1. I am a Task Force Officer with the Federal Bureau of Investigation ("FBI"), and have been since May 2001. I have also been a police officer with the Chattanooga Police Department ("CPD") in Chattanooga, Tennessee since for approximately 24 years. During my tenure as an investigator assigned to narcotics and violent crime investigations, I have gained a working knowledge of narcotics trafficking methods and techniques as well as violent crimes, including armed bank robbery, kidnapping, firearms use, etc. I have been training to conduct federal criminal investigations, particularly with respect to violent crime, locating and acquiring evidence of criminal activity, including cellular telephones, and seizing evidence and assets related to/derived from such criminal activity.

2. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrants and does not set forth all of my knowledge about this matter.

3. Based on the facts set forth in this affidavit, there is probable cause to believe that on or about April 1 through 3, 2019, DANIEL CLAYTON BRYANT ("BRYANT") violated Title 18, United States Code, Section 1201, that is, unlawfully seizing, confining, inveigling, decoying, kidnapping, abducting, or carrying away and holding for ransom or reward or otherwise any person who is willfully transported in interstate commerce Kidnapping; and Title 18, United States Code, Section 2113(a) and (e), that is, by force and violence, or by intimidation, taking or attempting to take from the person or presence of another, or obtains or attempts to obtain by extortion any property or money or other thing of value belonging to, or in

the case, custody, control, management, or possession of, any bank, credit union, or any savings and loan association, and in committing the offense forces any person to accompany him without their consent.

4. On April 4, 2019, at approximately 1253 hours, officers with the Chattanooga Police Department responded to the Bank of America located at 3620 Tennessee Avenue, Chattanooga, Tennessee, in response to a report of a kidnapping. Once on-scene, officers made contact with the victim. The victim told officers that he had been taken against his will and forced to withdraw thousands of dollars from his bank account, and provided documentary evidence showing the transaction history proving the amount of money withdrawn. The CPD violent crimes unit responded and further interviewed the victim.

5. The victim stated that on Monday, April 1, 2019, at approximately 1200 hours, he dropped his pickup truck at Mountain View Chevrolet to have the vehicle serviced. The victim had recently purchased the truck at Mountain View Chevrolet after receiving a substantial financial settlement resulting from severe on-the-job injuries that caused him to have one leg amputated and left him paralyzed on one side. The victim was offered a ride home by a Mountain View salesman identified by the victim as BRYANT.

6. After the victim got into BRYANT's vehicle, BRYANT transported the victim against his will to the Bank of America branch located on Gunbarrel Road in Chattanooga, Tennessee. BRYANT threatened to kill the victim and his family if the victim did not withdraw money from the victim's account. Over the course of two days, between April 1 and April 3, 2019, BRYANT held the victim against his will and transported him to several bank branches in the Eastern District of Tennessee and elsewhere, forcing him to withdraw money from his account under fear of death. As a result of this threat, the victim did withdraw money from his

accounts at the Bank of Tennessee, Gunbarrel Road bank branch, as well as other bank locations, all of which were then federally insured by the Federal Deposit Insurance Corporation (“FDIC”), totaling approximately \$199,000 in cash and cashier’s checks made out to BRYANT.

7. During the kidnapping, BRYANT took the victim across state lines to a hotel room in or near Atlanta, Georgia, where BRYANT took the victim’s cell phone and credit cards, and forced the victim to smoke crack cocaine, before returning the victim to Mountain View Chevrolet on April 3, 2019.

8. On April 5, 2019, the FBI obtained bank records from Pinnacle Bank related to the deposit of cashier’s checks drawn upon the victim’s Bank of America account and deposited into the account of BRYANT. As a result of this inquiry, the FBI learned that on April 1, 2019, Bryant deposited \$23,000 into his Pinnacle Bank Account, which consisted of Bank of America Cashier’s Check, No. 119200117771, issued from the Bank of America on Gunbarrel Road, Chattanooga, Tennessee, made out to BRYANT, in the amount of \$12,000.00 drawn from the victim’s account, plus \$11,000 in cash. At the time he obtained the \$12,000 cashier’s check, BRYANT also forced the victim to withdraw \$12,000 in cash from the victim’s Bank of America account. On April 3, 2019, BRYANT deposited a Bank of America Cashier’s Check, No. 1271921701, issued from the Bank of America at Arbor Place Mall in Douglasville, Georgia, made out to BRYANT, in the amount of \$175,000 drawn from the victim’s account into BRYANT’s Pinnacle Bank Account.

9. The FBI began actively looking for BRYANT on April 4, 2019, the date the kidnapping report was taken, but, despite repeated telephone contact with law enforcement, BRYANT refused to turn himself into police, and told officers that he would have his attorney contact them at a later date. Your Affiant obtained search warrants for two cellular phones

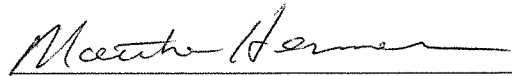
believed to be used by BRYANT, and the FBI began tracking BRYANT's phone on April 9, 2019, and located him briefly in the Atlanta, Georgia area before he fled on Interstate 20 westbound. Additional tracking information led to the location and apprehension of BRYANT in Cedar Hill, Texas, on April 14, 2019.

10. On April 5, 2019, your Affiant obtained and served a seizure warrant for funds maintained in BRYANT's Pinnacle Bank Account, recovering approximately \$288,000.

11. Based on the foregoing, your Affiant is of the opinion that there is probable cause to believe that DANIEL CLAYTON BRYANT violated Title 18, United States Code, Section 1201, that is, unlawfully seizing, confining, inveigling, decoying, kidnapping, abducting, or carrying away and holding for ransom or reward or otherwise any person who is willfully transported in interstate commerce Kidnapping; and Title 18, United States Code, Section 2113(a) and (e), that is, by force and violence, or by intimidation, taking or attempting to take from the person or presence of another, or obtains or attempts to obtain by extortion any property or money or other thing of value belonging to, or in the case, custody, control, management, or possession of, any bank, credit union, or any savings and loan association, and in committing the offense forces any person to accompany him without their consent.

[SIGNATURES ON NEXT PAGE]

FURTHER YOUR AFFIANT SAYETH NAUGHT.



MATTHEW HENNESSEE
TASK FORCE OFFICER
FEDERAL BUREAU OF INVESTIGATION

Subscribed and sworn to before me this 15th day of April, 2019.



SUSAN K. LEE
UNITED STATES MAGISTRATE JUDGE